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February 15, 2012

RE: Lalita Devi Sukhramn and Eshwar Nauth Sukhramn
CHAPTER 7
CASE NO. 11-42627(JF)

Dear Mr. Geltzer,

First, I apologize for the inadvertent error on the Notice of Settlement that included the center caption "Notice of Motion." With regards to the delay in filing, I respectfully state that the primary reason for the delay in filing from my end was due to the delay from you in responding to our faxes from January 17, 2012 and from January 25, 2012 in connection with the settlement of the proposed order. However, we leave it to the discretion of the Judge as to whether to consider the proposed order.

Second, it is unfortunate that you are refusing to reciprocate in granting me 45 days in which to do any possible corrections on the depositions for the 2004 Examination. Our firm has granted you an extension in the same matter in the past without asking any questions or requesting a legal basis on two separate occasions, once agreeing to extend you time to object to Debtors' discharge on May 27, 2011 and again agreeing to adjourn the December 13, 2011 hearing to January 12, 2012. Additionally, the rules of civility for the Bankruptcy Court under section 3(A) of page 1 states, "... a lawyer should agree to reasonable requests for extensions of time or for waiver of procedural formalities when the legitimate interests of the client will not be adversely affected." We seek 45 days for corrections, rather than the usual 30 days, because the Debtors have children and work full-time at different times during the day, therefore coordinating times for them to come into the office to review the record will be difficult and we would appreciate additional time to consult with the Debtors. In the event you still disagree,

under Rule 30(E) of the Federal Rules of Civil Procedure we are allowed 30 days from the time we are notified that the recordings or transcripts become available. However, we leave it to the discretion of the Judge as to whether to allow us the extra 15 days to review the record from the deposition and make any changes.

I strongly urge that we try to resolve these matters and move forward with the case. Thank you for your help and cooperation.

Sincerely,

A handwritten signature in black ink, consisting of a series of connected loops and curves, starting with a large 'R' and ending with a long, sweeping horizontal stroke.

Rita M. Espinosa Arguello, Esq.

CC: Marylou Martin, Esq.
U.S. Trustee's Office
271 Cadman Plaza East, room 4529
Brooklyn, NY 11201
Fax 718-422-4992

CC: Alicia M. Leonhard, Esq.
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Via Fax Only

CC: ECF Clerk